

Exhibit A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**USAMA JAMIL HAMAMA, et al.,**

Petitioners and Plaintiffs,

v.

**REBECCA ADDUCCI, et al.,**

Respondents and Defendants.

Case No. 2:17-cv-11910  
Hon. Mark A. Goldsmith  
Mag. David R. Grand  
Class Action

**SUPPLEMENTAL DECLARATION OF ARASH JAHANIAN**

I, Arash Jahanian, make this statement under the penalties of perjury of the laws of the United States, and if called to testify I could and would do so competently based upon my personal knowledge as follows:

1. I am a lawyer admitted to practice in the state of Colorado. I have substantial experience in the area of immigration law.
2. On October 26, 2017, I signed a declaration that was then submitted to this Court regarding Hani Al Bazoni, an immigration detainee housed in the Denver Contract Detention Facility in Aurora, Colorado.
3. That declaration detailed my October 26, 2017 meeting with Mr. Al Bazoni, in which I discussed options available to him under immigration law and procedure and the ongoing federal case, Hamama v. Adducci.
4. As detailed in that declaration, I believed that at the time he wished to be promptly removed to Iraq, and that this waiver of the protections provided by the Hamama Preliminary Injunction was both knowing and voluntary.
5. On November 30, 2017, Mr. Al Bazoni called me, and I spoke with him via telephone. He relayed, in what I believe were no uncertain terms, that he no longer wants to return to Iraq. He referred to the children he has here in the United States and represented that he had not been thinking clearly when he made the decision to waive his rights. He stated, "Please help me; I'm having problems."
6. During this conversation, Mr. Al Bazoni also stated that he had made several previous attempts to contact me. Reviewing my records, beginning on November 6, 2017, I received ten voicemail messages from the same number through which Mr. Al Bazoni

placed the November 30, 2017 call to me. The voicemail messages were simply an automated message asking whether I would accept a call from a correctional facility. However, I am not aware of any other detainee who would use that number to reach me, so it seems very likely that Mr. Al Bazoni began trying to reach me on November 6, 2017.

7. I communicated in English, a language Mr. Al Bazoni seemed to understand well. I believe that my communication with Mr. Al Bazoni was effective.
8. Based on this conversation, I believe that Mr. Al Bazoni no longer wishes to waive the protections provided by the Hamama Preliminary Injunction, and that he wishes to file a motion to reopen his immigration case and seek to stay in the United States. I believe this decision is knowing and voluntary.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge.

Executed this 30th day of November, 2017 in Denver, Colorado.

Signature

A handwritten signature in blue ink, consisting of stylized cursive letters, is written over a horizontal line.